1 BENNY D. BARCO #253924 BARCO LAW, A Professional Corporation 2 642 Pollasky Ave., Ste 200 Clovis, CA 93612 3 Telephone: (559) 575-0577 bbarco@barcolaw.com 4 Attorney for: Debtor REYMUNDO A. GARZA 5 6 7 UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF CALIFORNIA 8 9 CASE NO.: 20-10489-B-13 10 REYMUNDO A. GARZA Chapter 13 11 DCN: BDB-2 12 DATE: APRIL 15, 2020 Debtor. TIME: 9:30 a.m. 13 PLACE: U.S. Bankruptcy Court 2500 Tulare Street, 14 5th Floor, Court Room 13 Fresno, CA 93721 15 JUDGE: RENÉ LASTRETO II 16 17 DECLARATION OF REYMUNDO A. GARZA IN SUPPORT OF MOTION TO VALUE COLLATERAL OF WELLS FARGO DEALER SERVICES, INC. 18 I, REYMUNDO A. GARZA, declare as follows: 19 I am the Debtor in the above captioned case. I have personal knowledge of the 1. 20 facts stated in this declaration. If the Court or a party were to call upon me to do so, I could and 21 would competently testify to the facts stated herein under oath. 22

- 23
- 2. At the time of the commencement of the above captioned case, I owned and still own the personal property, to wit: a 2016 Hyundai Veloster, 31,000 miles, in fair condition.
- 24

25

- 3. I purchased the vehicle on or about November 16, 2016, which is more than 910 days prior to the day I filed this case.
- 2627

28

4. As of the commencement of the case, the personal property had a fair market value of \$13,025.00. My opinion of the value is based on personal knowledge of the vehicle as

1	owner, and familiarity with the vehicle and like vehicles of the same make, model and age.
2	Additionally, the current NADA Guide Average Retail value of the 2016 Hyundai Veloster is
3	\$13,025.00. Attached as Exhibit A of the EXHIBIT TO MOTION TO VALUE COLLATERAL
4	OF WELLS FARGO DEALER SERVICES, INC., is a true and correct copy of the NADA Guide
5	average retail value online report which references the retail value of a 2016 Hyundai Veloster.
6	6. Based on the current condition of the vehicle, I do not believe that it could be
7	replaced for more than \$13,025.00 and believe that anyone trying to sell it would be unlikely to
8	get that much for it.
9	I declare under penalty of perjury under the laws of the State of California that the above
10	is true and correct. Executed on March 17, 2020 at Clovis, California.
11	
12	Respectfully submitted,
13	
14	Dated: March 17, 2020 /s/ REYMUNDO A. GARZA
15	REYMUNDO A. GARZA, Debtor
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
	-2-